



Stephanie U. Eaton  
 Direct Dial (336) 631-1062  
 seaton@spilmanlaw.com  
 \*Licensed in NC, SC and FL

February 21, 2020

**Via SCPSC E-FILING DMS**

The Honorable Jocelyn G. Boyd  
 Chief Clerk/Administrator  
 Public Service Commission of South Carolina  
 101 Executive Center Drive  
 Columbia, SC 29210

**Re: Dominion Energy South Carolina, Incorporated's 2020 Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider; Docket No. 2020-41-E**


Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By   
 Stephanie U. Eaton (SC Bar No. 80073)  
 Carrie Harris Grundmann

Derrick Price Williamson  
 Spilman Thomas & Battle, PLLC  
 1100 Bent Creek Boulevard, Suite 101  
 Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

*Counsel to Walmart Inc.*

SUE/sds  
 Attachments  
 c: Certificate of Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2020-41-E

IN RE:	)	<b>CERTIFICATE OF SERVICE</b>
	)	
Dominion Energy South Carolina,	)	
Incorporated's 2020 Annual Update on	)	
Demand Side Management Programs and	)	
Petition for an Update to Rate Rider	)	

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I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

K. Chad Burgess, Esquire  
Matthew W. Gissendanner, Esquire  
Dominion Energy South Carolina, Inc.  
Mail Code C222  
220 Operation Way  
Cayce, SC 29033  
[kenneth.burgess@dominionenergy.com](mailto:kenneth.burgess@dominionenergy.com)  
[matthew.gissendanner@dominionenergy.com](mailto:matthew.gissendanner@dominionenergy.com)

Andrew M. Bateman, Esquire  
Jenny R. Pittman, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[abateman@ors.sc.gov](mailto:abateman@ors.sc.gov)  
[jpittman@ors.sc.gov](mailto:jpittman@ors.sc.gov)

Becky Dover, Esquire  
Carri Grube-Lybarker, Esquire  
SC Department of Consumer Affairs  
293 Greystone Boulevard, Suite 400  
Columbia, SC 29210  
[bdover@scconsumer.gov](mailto:bdover@scconsumer.gov)  
[clybarker@scconsumer.gov](mailto:clybarker@scconsumer.gov)



Stephanie U. Eaton (SC Bar No. 80073)

Dated: February 21, 2020

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2020-41-E

IN RE:	)	<b>PETITION TO INTERVENE OF</b>
	)	<b>WALMART INC.</b>
Dominion Energy South Carolina,	)	
Incorporated's 2020 Annual Update on	)	
Demand Side Management Programs and	)	
Petition for an Update to Rate Rider	)	

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Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On January 31, 2020, Dominion Energy South Carolina, Inc. ("DESC") filed an Annual Update on Demand Side Management ("DSM") Programs and Petition for an Update to Rate Rider ("Petition"). The Petition was filed pursuant to S.C. Code Ann. Section 58-37-20 (2015), S.C. Code Ann. Regs. 103-819 and 103-825 (2012), the Rules of Practice and Procedure of the Public Service Commission of South Carolina, and all other applicable law and rules.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, Arkansas 72712.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DESC. Walmart has approximately 42 facilities in South Carolina that are served by DESC, which include Walmart Supercenters, Sam's Clubs, and gas stations. Walmart purchases more than 130 million kWh annually from DESC.

Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DESC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and energy efficiency ("EE") and therefore is very interested in this case and has participated in similar cases in the past. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DESC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

Stephanie U. Eaton  
 Carrie Harris Grundmann  
 Spilman Thomas & Battle, PLLC  
 110 Oakwood Drive, Suite 500  
 Winston-Salem, NC  
 Phone: (336) 631-1062  
 Fax: (336) 725-4476  
 E-mail: [seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)

Derrick Price Williamson  
 Spilman Thomas & Battle, PLLC  
 1100 Bent Creek Blvd., Suite 101  
 Mechanicsburg, PA 17050  
 Phone: (717) 795-2740  
 Fax: (717) 795-2743  
 E-mail: [dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

[cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com)

Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Grundmann be added jointly to the service list. Walmart may cause to be filed a motion for Mr. Williamson and Ms. Grundmann to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson and Ms. Grundmann be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

**WHEREFORE**, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By   
Stephanie U. Eaton (SC Bar No. 80073)  
Carrie Harris Grundmann  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
Phone: (336) 631-1062  
Fax: (336) 725-4476  
E-mail: [seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)  
[cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com)

Derrick Price Williamson  
1100 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
Phone: (717) 795-2740  
Fax: (717) 795-2743  
E-mail: [dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

*Counsel to Walmart Inc.*

Dated: February 21, 2020